

### **REMARKS**

Applicant respectfully requests entry and consideration of the above amendments even though presented after a final rejection. Applicant submits that the amendments do not raise new issues or require a new search. Further, entry and consideration of the amendments may isolate issues for potential allowance or appeal. The amendments were not presented earlier in the prosecution due to a better understanding of the Examiner's position as reflected in the latest Office Action.

### **Summary**

Claims 1, 2, 4, 5 and 7-24 stand in this application. Claims 3 and 6 have been canceled without prejudice. Claims 1, 10, 16 and 22 have been amended. No new matter has been added. Favorable reconsideration and allowance of the standing claims are respectfully requested

### **Examiner Interview**

Applicants would like to thank Examiner Li for conducting a telephone interview with Applicants' representative on June 13, 2007. During the interview, Examiner Li and Applicants' representative discussed the independent claims, the applied reference(s), and the grounds of rejection. The substance of the interview is reflected by the foregoing amendments and the following remarks.

**35 U.S.C. § 112**

Claims 1, 2, 4, 5 and 7-24 have been rejected under 35 U.S.C. § 112 for not particularly pointing out and distinctly claiming the subject matter which the applicant regards as his invention. Applicant respectfully traverses the rejection based on the above amendments. These claims have been amended in accordance with the Office Action, and removal of this rejection is respectfully requested. Applicant further submits that the above amendments are made to overcome a § 112 rejection and are not made to overcome the cited reference. Accordingly, these amendments should not be construed in a limiting manner.

**35 U.S.C. § 102**

At page 3, paragraph 6 of the Office Action claims 1, 2, 4, 5 and 7-24 stand rejected under 35 U.S.C. § 102 as being anticipated by Gove et al., U.S. Patent Number 5,212,777 (hereinafter "Gove"). Applicant respectfully traverses the rejection, and requests reconsideration and withdrawal of the anticipation rejection.

Although Applicant disagrees with the broad grounds of rejection set forth in the Office Action, Applicant has amended claims 1, 10, 16 and 22 in order to facilitate prosecution on the merits.

Applicant respectfully submits that to anticipate a claim under 35 U.S.C. § 102, the cited reference must teach every element of the claim. *See* MPEP § 2131, for example. Applicant submits that Gove fails to teach each and every element recited in claims 1, 2, 4, 5 and 7-24 and thus they define over Gove. For example, with respect to claim 1, Gove fails to teach, among other things, the following language:

wherein said data paths are configured based upon said connections between said control units and said data paths to perform said first process and said second process in parallel.

According to the Office Action, this language is disclosed by Gove at column 63, lines 4-20. Applicant respectfully disagrees.

The Gove reference fails to disclose all the language of claim 1. For example, Gove at the given cite, in relevant part, states:

for changing at least some of the processors from operation in the SIMD operating mode to operation in the MIMD operational mode where each processor of the MIMD group operates from separate instructions provided by separate instruction memories.

Gove may arguably suggest that it is possible for some processors to run concurrently using a SIMD and MIMD operational mode. Gove fails to teach or suggest, however, how to configure a system so that SIMD and MIMD processes may be run in parallel. By way of contrast, the claimed subject matter discloses that running SIMD and MIMD processes in parallel is achieved by configuring the data paths based upon the connections between said data paths and the control units. Consequently, Gove fails to disclose all the elements or features of the claimed subject matter. Accordingly, Applicant respectfully requests removal of the anticipation rejection with respect to claim 1. Furthermore, Applicant respectfully requests withdrawal of the anticipation rejection with respect to claims 2, 4, 5 and 7-9, which depend from claim 1 and, therefore, contain additional features that further distinguish these claims from Gove.

Claims 10, 16 and 22 recite features similar to those recited in claim 1. Therefore, Applicant respectfully submits that claims 10, 16 and 22 are not anticipated and are patentable over Gove for reasons analogous to those presented with respect to claim 1. Accordingly, Applicant respectfully requests removal of the anticipation rejection with respect to claims 10, 16 and 22. Furthermore, Applicant respectfully requests withdrawal of the anticipation rejection with respect to claims 11-15, 17-21, 23 and 24 that depend from claims 10, 16 and 22, and therefore contain additional features that further distinguish these claims from Gove.

### **Conclusion**

For at least the above reasons, Applicant submits that claims 1, 2, 4, 5 and 7-24 recite novel features not shown by the cited references. Further, Applicant submits that the above-recited novel features provide new and unexpected results not recognized by the cited references. Accordingly, Applicant submits that the claims are not anticipated nor rendered obvious in view of the cited references.

Applicant does not otherwise concede, however, the correctness of the Office Action's rejection with respect to any of the dependent claims discussed above. Accordingly, Applicant hereby reserves the right to make additional arguments as may be necessary to further distinguish the dependent claims from the cited references, taken alone or in combination, based on additional features contained in the dependent claims that were not discussed above. A detailed discussion of these differences is believed to be unnecessary at this time in view of the basic differences in the independent claims pointed out above.

Appl. No. 10/813,790  
Response Dated July 16, 2007  
Reply to Office Action of March 14, 2007

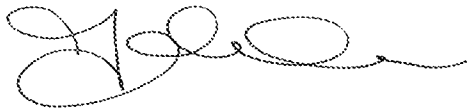
Docket No.: 1020.P18416  
Examiner: Li, Aimee J.  
TC/A.U. 2183

It is believed that claims 1, 2, 4, 5 and 7-24 are in allowable form. Accordingly, a timely Notice of Allowance to this effect is earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if such contact would further the examination of the present patent application.

Respectfully submitted,

KACVINSKY LLC

A handwritten signature in black ink, appearing to read 'John F. Kacvinsky', with a long horizontal flourish extending to the right.

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John F. Kacvinsky, Reg. No. 40,040  
Under 37 CFR 1.34(a)

Dated: July 16, 2007

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